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 Signature Page]

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE OPTICAL DISK DRIVE PRODUCTS)	MDL No. 3:10-md-2143 RS
ANTITRUST LITIGATION)	
)	
)	STIPULATION BY INDIRECT
)	PURCHASER PLAINTIFFS AND
)	INTERVENOR UNITED STATES OF
)	AMERICA REGARDING THE
)	DEPOSITION OF WOO JIN
)	("EUGENE") YANG OF HLDS
)	DEFENDANT FAMILY
)	
)	DATE ACTION FILED: Oct. 27, 2009

 This Document Relates to:
 ALL INDIRECT PURCHASER ACTIONS

1 WHEREAS on December 21, 2012, indirect purchaser plaintiffs filed an unopposed motion
2 requesting that this Court grant them leave to depose Woo Jin (“Eugene”) Yang while Mr. Yang
3 was located at Lompoc prison in California;

4 WHEREAS the United States Department of Justice, Antitrust Division (“DOJ”), an
5 intervenor in this action, has requested that indirect purchaser plaintiffs postpone their deposition
6 of Mr. Yang for a period of time or DOJ would move the Court for an order delaying Mr. Yang’s
7 testimony based on the nature of the DOJ’s ongoing criminal antitrust investigation of the ODD
8 market;

9 IT IS HEREBY STIPULATED AND AGREED THAT:

10 1. Indirect purchaser plaintiffs’ Unopposed Motion for Leave to Depose Woo Jin Yang
11 (aka “Eugene Yang”) in Lompoc Federal Correctional Institution, ECF No. 732, filed on December
12 21, 2012, requesting leave of Court to depose Mr. Yang while he is located at Lompoc federal
13 correctional institution is hereby withdrawn and the Court need take no further action;

14 2. The indirect purchaser plaintiffs will not seek the deposition of Mr. Yang for a
15 period of at least three months from the date of this stipulation, absent agreement with the DOJ;
16 and

17 3. Should the intervenor United States Department of Justice request the postponement
18 of the deposition of Mr. Yang beyond this three-month period, indirect purchaser plaintiffs will
19 consider this request in good faith.

20 IT IS SO STIPULATED.

21 DATED: January 7, 2013

HAGENS BERMAN SOBOL SHAPIRO LLP

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DATED: January 7, 2013

UNITED STATES DEPARTMENT OF JUSTICE
ANTITRUST DIVISION

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Dated: Jan. 8, 2013



CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2013, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have caused to be mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

/s/ Jeff D. Friedman
JEFF D. FRIEDMAN